

EXHIBIT B

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, APRIL MUNIZ,
MARCUS MARTIN, NATALIE ROMERO,
CHELSEA ALVARADO, THOMAS BAKER
and JOHN DOE,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,
CHRISTOPHER CANTWELL, JAMES
ALEX FIELDS, JR., VANGUARD
AMERICA, ANDREW ANGLIN,
MOONBASE HOLDINGS, LLC, ROBERT
“AZZMADOR” RAY, NATHAN DAMIGO,
ELLIOT KLINE a/k/a/ ELI MOSLEY,
IDENTITY EVROPA, MATTHEW
HEIMBACH, MATTHEW PARROTT a/k/a
DAVID MATTHEW PARROTT,
TRADITIONALIST WORKER PARTY,
MICHAEL HILL, MICHAEL TUBBS,
LEAGUE OF THE SOUTH, JEFF SCHOEP,
NATIONAL SOCIALIST MOVEMENT,
NATIONALIST FRONT, AUGUSTUS SOL
INVICTUS, FRATERNAL ORDER OF THE
ALT-KNIGHTS, MICHAEL “ENOC”
PEINOVICH, LOYAL WHITE KNIGHTS OF
THE KU KLUX KLAN, and EAST COAST
KNIGHTS OF THE KU KLUX KLAN a/k/a
EAST COAST KNIGHTS OF THE TRUE
INVISIBLE EMPIRE,

Defendants.

Civil Action No. 3:17-cv-00072-NKM

DECLARATION OF JESSICA PHILLIPS

I, Jessica Phillips, on this 4th day of October, 2021, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a Partner at the law firm at Paul, Weiss, Rifkind, Wharton & Garrison LLP, one of the law firms representing the Plaintiffs in this action.

2. I am a member in good standing of the District of Columbia and Illinois Bars. I have been admitted to appear *pro hac vice* before this Court for and on behalf of the Plaintiffs in the above-captioned action.

3. On October 1, 2021, I met and conferred with William Edward ReBrook, counsel for Defendant Jeff Schoep regarding his client's amended witness list [ECF No. 1107].

4. I told Mr. ReBrook that Plaintiffs would move to preclude any witnesses that had not been properly disclosed to Plaintiffs, unless Defendant Schoep made any previously undisclosed witnesses immediately available for depositions.

5. In response, Mr. ReBrook stated that he would try to make Daryl Davis, a previously undisclosed witness, available for a deposition prior to trial.

Executed on: October 4, 2021
Washington, D.C.

/s/ Jessica Phillips

Jessica Phillips